



0 AR-17-000-4716
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1200 Summit Ave
Suite 320
Fort Worth, TX 76102

P: (817) 339.5400
F: (817) 339.5401
www.Crestwoodlp.com

January 11, 2017

U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive, Mail Code: E143-01I
Research Triangle Park, NC 27709

RECEIVED FEB 01 2017

RE: Request for 90-Day Extension to Respond to Part 2 of the Oil and Gas Information Collect Request

Dear Ms. Shine:

Crestwood Midstream Partners LP, Crestwood Equity Partners LP, and their subsidiary companies (collectively "Crestwood") operate several facilities and pipelines in the gathering and boosting ("G&B"), processing, transmission pipeline, and storage sectors of the oil and gas industry that received an Information Collection Request ("ICR") from the U.S. EPA in December 2016. With this letter, Crestwood respectfully requests a 90-day extension to respond to each ICR. Crestwood understands that each ICR is due within 180 days of receipt of the request letter, and therefore, if an extension is granted, would instead be due within 270 days of receipt of the request letter.

The time period provided to respond to the ICR's directly overlaps with the annual reporting season for air quality. During this time, Crestwood personnel are very busy preparing state-level emission inventories, annual reports required by permits and other air regulations, and greenhouse gas inventories. In particular, the first report under the gathering and boosting sector of 40 CFR 98, Subpart W must be prepared and submitted by March 31, 2017. Therefore, in order to collect the data needed for the ICRs and prepare the response, Crestwood believes additional time is warranted.

Crestwood has provided a list of its sites that have received an ICR below. In addition, Crestwood requests a 90-day extension also be granted for its gathering and boosting sites and pipeline systems selected by the Part 2 random generator tool.

Description	ID	Sector
Crestwood Midstream Partners G&B	2190000	G&B
Crestwood Equity Partner G&B	2193000	G&B
Cowtown Gas Processing Partners G&B	2923000	G&B
Cowtown Gas Processing Plant	3001970	Processing
Alliance CS	3001990	Processing
Baker Road Treater	3002050	Processing

Connections
for America's
Energy™

Description	ID	Sector
Indian Creek Plant	3010020	Processing
North Coles Levee	3002060	Processing
Central New York Oil and Gas LLC	5002440	Transmission Pipeline
Cowtown Pipeline Partners LP	5002470	Transmission Pipeline
Seneca Lake Storage	6000250	Storage
Adrian [Steuben] Storage	6000260	Storage
Central New York Oil and Gas LLC [Stagecoach]	6000520	Storage
Marcellus Operations	6000820	Storage
Tres Palacios	6010540	Storage

Thank you for your consideration of this request. If you have any questions or require additional information, please contact me at (b) (6) or via e mail at (b) (6)@crestwoodlp.com.

Sincerely,

(b) (6)

(b) (6)

Air Quality Manager
Crestwood

January 19, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 31 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1472500

Dear Mr. Tsirigotis:

On December 9th 2016, my company, John Oates Co., Inc, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR") .

As a result of market conditions we have trimmed our staff (b) (4) responsible for collecting information on (b) (4) wells, (b) (4) tank batteries, and (b) (4) compressors spread out over 10 miles. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season (b) (6) (b) (6). Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III, Texas Tier 2 Chemical Inventory Reports also due.. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?

- Several of my wells do not have an API number as they were drilled prior to the API number establishment. What identifier do I use for these wells?
- I do not operate any designated natural gas wells, however, I do collect and sell "Casing Head Gas." Does this qualify as natural gas produced for sales as asked in section 3 and 4?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?]

Please contact me if you have any questions and I look forward to hearing from you.

Thanks,

(b) (6)

Jack Oates

President & Owner

OAR-17-000-4751

PI SAHARA OPERATING COMPANY

January 25, 2017

RECEIVED JAN 31 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code:E143-01
Research Triangle Park, NC 27709

Re: Request for Extension, Information Collection Request Dated 11-14-2016, Received
12-9-2016

Dear Ms. Shine:

It is requested that Sahara Operating Company be granted an additional 60 days in which to comply with the referenced Information Collection Request.

We are a small, family run business, (b) (4)
(b) (4). As yet, no one in our organization has been able to figure out if we have any wells on your Part 2 Detailed Facility survey list.

As to Part 1 Operator Frame Census, we are gathering information to fill in the spreadsheet, but this is a time consuming process. We are also still unsure, despite the definitions provided, about the following:

- 1.) What is the Unique Surface Site ID for a tank battery on a 1 or 2 well lease that is not at a well site? Is that the Railroad Commission or New Mexico OCD Lease Number? If the tank battery is at a well site, is the API number the Unique ID for both the well and the tank battery?
- 2.) What are the Basin ID's for the Permian and Delaware Basins? If a well is on the Central Basin Platform, is that the Permian Basin?
- 3.) How do we know if a site is subject to "fugitive emissions requirements in 40 CFR 60.5397a of subpart OOOOa"?

We have been gathering Latitude and Longitude information, and visiting facilities to get locations and battery equipment counts, but could really use some guidance on the above issues.

I really don't know if your survey anticipated companies of our size, but we have been in business for over 26 years, and this is the most complex and unprecedented

January 25, 2017

regulatory request we have ever been asked to complete. The anticipated burden of this request on our company is at least one order of magnitude, or more, higher than estimated by the EPA.

With only 2 weeks or so left in our original time frame, I hold out little hope of completing this on time. An additional 60 days would, I believe, bring compliance with this incredibly burdensome regulatory request within the realm of possibility.

Your consideration of this request, and reply to the above questions, is greatly appreciated.

Sincerely,

(b) (6)

Rob McAlpine
President

Sahara Operating Company
P.O. Box 4130
Midland, TX 79704

MIDLAND / ODESSA
TX 79711
26 JAN 2017 PM



Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code:E143-01
Research Triangle Park, NC 27709

27709\$0310





017-000-5614
P1

TITANIUM ENVIRONMENTAL SERVICES, LLC

P.O. Box 4029
Longview, Texas 75606-4029

Phone (903) 234-8443
Fax (903) 234-1641

January 13, 2017

Certified Mail #7016 2140 0000 8043 2617

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709
shine.brenda@epa.gov

RECEIVED FEB 01 2017

Re: EPA Section 114 Oil and Gas Information Collection Request
Camterra Resources, Inc.
2615 East End Blvd. South
Marshall, Texas 75672

*already
responded*

Dear Ms. Shine:

Titanium Environmental Services, LLC has been contracted by Camterra Resources, Inc. to assist in their response to the EPA Section 114 Oil and Gas Information Collection Request.

The EPA letter, dated November 14, 2016, was received on December 9, 2016.

Camterra Resources currently operates (b) (4) sites altogether in several states. Information needed in Part 1 of the ICR will require manual retrieval of records, some which are quite old, but hopefully still available. We will need to contact a large number of individual pumpers to determine the current tank throughput volumes, in addition to verifying coordinates, identification, and specific equipment at each location. We estimate that approximately 200 professional hours of effort over the course of eight weeks will be required to assemble the necessary information.

Camterra Resources therefore requests a 60-day extension to reply to Part 1 of this request. We propose to submit the Part 1 response no later than April 9, 2017.

Thank you for your consideration of our request for an extension.

Sincerely,

(b) (6)
(b) (6)

cc: Ms. Pam Johnson, Camterra Resources, Inc., 2615 East End Blvd. South, Marshall, Texas 75672

McClelland Creek Properties, Inc.

P. O. Box 1578

Pampa, Texas 79066-1578

Phone 806 665-1861

Fax 806 665-7981

0A2-17-000-4754

A1

January 27, 2017

RECEIVED FEB 02 2017

Mr. Peter Tsirigotis

Director, Sector Policies and Programs Division Office of Air Quality Planning and Standards

United States Environmental Protection Agency

109 T. W. Alexander Drive

Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR - Facility ID 1420950

Dear Mr. Tsirigotis:

On December 8, 2016 McClelland Creek Properties, Inc., in addition to 4 other companies that we operate, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension to June 15, 2017 to respond to the information collection request ("ICR").

As a result of market conditions we have trimmed our office staff (b) (4) (b) (6) and this makes me responsible for collecting information on these (b) (4) leases with approximately (b) (4) wells that are spread out over three counties. Much of the information is not readily available and will require me to personally visit each site or research information on wells that were plugged prior to us becoming the operator. These are tasks that I cannot delegate to someone else since this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability.

In addition to the complications associated with limited time and Holidays, the timing could not be worse with year-end reports due to the federal government and the State of Texas as well as year-end financials that are required by our bank for our different companies. I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. I am working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities and respectfully request this extension.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

D. L. Porter
President

McClelland Creek Properties, Inc.
P. O. Box 1578
Pampa, TX 79066-1578

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X

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

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0AR-17000-4736
P1
XET, Inc.

P. O. Box 1999

Pampa, TX 79066-1999

Phone 806 669-1699 Fax 806 665-7981

RECEIVED FEB 02 2017

January 27, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR - Facility
ID 1734200

Dear Mr. Tsirigotis:

On December 23, 2016 XET, Inc., in addition to 4 other companies that we operate, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension to June 15, 2017 to respond to the information collection request ("ICR").

As a result of market conditions we have trimmed our office staff (b) (4) (b) (6) and this makes me responsible for collecting information not only for the lease and wells operated by XET, Inc. but also for the leases and wells operated by our other 4 companies. Much of the information is not readily available and will require me to personally visit each site or research information on wells that were plugged prior to us becoming the operator. These are tasks that I cannot delegate to someone else since this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability.

In addition to the complications associated with limited time and Holidays, the timing could not be worse with year-end reports due to the federal government and the State of Texas as well as year-end financials that are required by our bank for our different companies. I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. I am working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities and respectfully request this extension.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

(b) (6)

Vice President

X
XET, Inc.
P. O. Box 1999
Pampa, TX 79066-1999

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7016 1370 0002 2929 0100

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

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**ADDAX
OPERATING, LLC**

P.O. Box 1
Wichita Falls, Texas 76307
Tel: (940) 322-5900
Fax: (940) 440-5000

042-17-000-4757

101

RECEIVED FEB - 6 2017

February 1, 2017

Ms Brenda Shine
Shine.brenda@epa.gov
Mr. Peter Tsirigotis, Director
Tsirigotis.peter@epa.gov
U.S. Environmental Protection Agency
109 T.W.Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Information Collection Request (ICR)

Dear Sir/Madam:

Due to the current economic state of the oil and gas business, Addax Operating, LLC presently has only (b) (4) (b) (6) to look after, maintain field operations and handle any paper work.

(b) (6)

(b) (6)

Therefore, I am requesting a 60 day extension to the filing of the Information Collection Request (ICR) and that a hard copy of the forms to be filed be mailed to Addax Operating, LLC at P.O. box 1, Wichita Falls, Texas 76307

Thank You

(b) (6)

(b) (6)

P.O. BOX 1
WICHITA FALLS, TX 76307

CERTIFIED MAIL



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RETURN RECEIPT
REQUESTED

Mr Peter Tsirigotis
US Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code E143-01
Research Triangle Park, NC 27709

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ALPINE GAS OPERATOR, LLC

January 25, 2017

RECEIVED FEB - 6 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Certified Mail: 7012 3050 0002 2824 4842

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1017750

Dear Mr. Tsirigotis:

On December 13, 2016, my company, Alpine Gas Operator, LLC, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 90 days to respond to the information collection request ("ICR").

(b) (4) the remaining staff is responsible for collecting information on properties spread out over the State of Mississippi. Much of the information is not readily available. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the holiday season. Additionally, it is unclear to me how to calculate when the response is currently due because of the holidays and I would request that you indicate in your response to this letter when EPA considers the response due.

In addition to requesting additional time, I have several questions about the Part 1 Survey.

1. What if there are several owners? Do they each need to respond?
2. Whose responsibility is it to respond when the operator is different than the owner?
3. Whose responsibility is it to respond when there is more than one owner?
4. Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the letter dated November 14, 2016?

Mr. Peter Tsirigotis
January 25, 2017
Page 2

5. I have vertical tanks on some sites that are commonly referred to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. Do you agree with that assessment?
6. I believe most sites do have thermal combustors present. If they are not active 24/7 (i.e. rarely needed/used) do they still need to be reported?

In addition to the complications associated with limited staff and holidays, the timing is difficult with annual emissions inventory, annual greenhouse gas ("GHG") reporting and Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

Please contact me at the address below if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

(b) (6)



ALPINE GAS OPERATOR, LLC
2100 Ross Avenue, Suite 970
Dallas, Texas 75201



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TX 75201
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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099





0A12-17-000-4760

P1

brehm oil, inc.

CLARENCE E. BREHM
(1910 - 1980)

CAROL B. BREHM
(1938 - 1994)

P.O. Drawer 648 • Mt. Vernon, Illinois 62864 • (618) 242-4620 • Fax (618) 242-4640

January 30, 2017

RECEIVED FEB - 6 2017

Attn: Mr. Peter Tsirigotis

Attn: Ms. Brenda Shine

U.S. Environmental Protection Agency

109 T.W. Alexander Dr. Mail Code E143-01

Research Triangle Park, NC 27709

To whom it may concern:

Brehm Oil, Inc. is requesting a 60 day extension for completion of Part 1 of the ICR.

Brehm Oil, Inc. received this ICR a few weeks ahead of the Christmas (b) (6)

(b) (6) (b) (4)

(b) (4) Additionally, we have had end of the year reporting and recapping that needed to be completed above and beyond our typical monthly practices and procedures. This ICR request will take a large amount of time due to the number of wells Brehm Oil, Inc. operates and the travel time it will take to make on site visits for some of these wells. Time has been a luxury we haven't had much of these past two months.

Additionally, we have wells on substructures that are adjacent to the Wabash River and are currently under water. This is preventing us from being able to travel to these sites and obtain latitude and longitude coordinates for these wells at this time. Typically, we could see these wells stay under water off and on from now until June. It is very hard to predict what the river will do and when it may go down.

The reasons listed above explain why Brehm Oil, Inc. is sincerely requesting this additional time to complete part 1 of the ICR. If you have any questions or concerns please let me know.

Sincerely,

(b) (6)

Petroleum Geologist

Brehm Oil, Inc.



brehm oi

P.O. Box 648 • Mt. Vernon, Illinois 62864

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Attn: Peter Tsirigotis
U. S. Enviromental Protection Agency
109 T.W. Alexander Dr. Mail Code E143-01
Research Triangle Park, NC 27709

27709-031099



DAR-17-000-4761

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01-16-2017

C MODESIT OIL PRODUCTION LLC

(b) (6)

ROSEDALE IN 47874

DEAR MR. PETER TSIRIGOTIS
MS. BRENDA SHINE

WE WILL NEED AN EXTENSION OF
TIME TO COMPLETE THE WORK THAT HAS
BEEN REQUESTED.

(b) (4)

(b) (4)

THIS REQUEST PUTS
A TERRIBLE BURDEN ON NORMAL WORK
LOAD THAN WE CAN HANDLE.

WE WOULD APPRECIATE VERY MUCH IF
YOU COULD SEND US THE FORMS WE NEED.
WE DO NOT ^{HAVE} ACCESS TO THE REQUIRED PROGRAM.

WE WILL START WORKING ON THIS PROJECT
AS SOON AS WE CAN. THERE IS NOT MUCH

THAT CAN BE DONE WITHOUT THE
"NECESSARY FORMS". IS IT POSSIBLE FOR
YOU TO SEND US THE \$66⁰⁰ REQUIRED
FOR THE COMPUTER SUBSCRIPTION THAT
ACCESSES THE NEEDED PROGRAM?

SINCERELY,

(b) (6)



C MODESITT OIL PROD

ROSEDALE, IN 47874

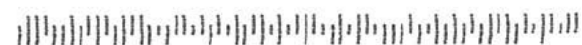
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ATTN: BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE, MAIL CODE: E143-01
RESEARCH TRIANGLE PARK, NC 27709

27709-031099



OPR-17-000-4162

PI



Callon Petroleum Company

1401 ENCLAVE
SUITE 600
HOUSTON, TEXAS 77077

PHONE 281-589-5200
FAX 281-589-5215

January 23, 2017

RECEIVED FEB - 6 2017

Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
Washington, D.C. 20460

RE: Facility ID = 1105150
e-GGRT code KUWT-EARO and P9FY-FEAU

Dear Mr. Tsirigotis,

Callon Petroleum Operating Company (Callon) requests a 60 day extension to respond to Part 1 of the Information Request for Oil and Gas Facilities (ICR) which was received on December 9, 2016. The reasons for this request include (1) data collection and confirmation of data accuracy associated with recent asset acquisitions, (2) staffing and resource limitations, (3) the March 1st SARA/Tier II reporting deadline, and (4) the March 31st GHG reporting deadline.

1. Callon made (b) (4) and is currently capturing asset information from these sites as the previous operators did not provide the level of detail required to respond to the ICR. The assets acquired, while located solely in the Permian Basin, still require travel time to inventory the facility.
2. Callon meets the ICR Part 1 definition of a small business, currently having less than 150 employees. (b) (4)
3. At least one member of our Health, Environmental, Safety, & Regulatory team will spend (b) (4) over the next month preparing and delivering the required information to comply with the SARA/Tier II regulations.
4. At least one member of our Health, Environmental, Safety & Regulatory team will spend (b) (4) over the next month preparing the information necessary to comply with 40 CFR Part 98 Subpart W. (b) (4)

Your consideration of this extension request is very much appreciated.

Sincerely,

(b) (6)

Health, Environmental Safety & Regulatory Manager
Callon Petroleum Operating Company
Cc: Brenda Shine

Callon Petroleum Company
1401 Enclave, Suite 600
Houston, TX 77077

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7012 2920 0001 7914 4317

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HOUSTON, TX

Peter Tsirigotis
Director, Sector Policies/Program Division
Office of Air Quality Planning & Standards
United States EPA
Washington, D.C. 20460

JAN 30 2017



OAE 17-000-4764
P1



January 26, 2017

VIA email and FEDEX

Brenda Shine

Office of Air Quality Planning and Standards

U. S. Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code: E143-01

Research Triangle Park, NC 27709

Shine.brenda@epa.gov

RECEIVED FEB 03 2017

Re: Information Collection Request by the EPA Office of Air and Radiation


Dear Ms. Shine:

Capstone Natural Resources II, LLC (Capstone) recently received an Information Collection Request (ICR) from the EPA. The timing of our receipt of the request coincided with (b) (6)

(b) (4) While we work diligently to more fully understand the breadth and detail of the request and to provide the EPA with the most accurate possible information, Capstone respectfully requests a sixty (60) day extension for completion of the ICR.

We request this extension to allow us to conduct the detailed reviews necessary to provide the information requested. By granting this extension and allowing one hundred twenty (120) days from the date we received the ICR to respond to Part I, EPA will be providing much needed time to respond to the ICR.

Thank you for your consideration of this request. I can be reached at (918) 236-3802(o) or (b) (6) (b) (6) should you have any questions.

Sincerely, 

(b) (6)

Capstone Natural Resources II, LLC

cc: Peter Tsirigotis

Tsirigotis.peter@epa.gov

0112-17-000-4765
P1

DEE DRILLING COMPANY

DEE BUILDING

P. O. BOX 7

MT. CARMEL, ILLINOIS 62863

TELEPHONE (618) 262-4136

J. ROY DEE III
PRESIDENT

RECEIVED FEB - 6 2017

January 31, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Operator ICR ID: 1176900
Dee Drilling Co.

Dear Ms. Brenda Shine:

We have been working on getting Part 1 of our ICR completed and are requesting a 30-60 day extension. There is more information needed for the report, therefore, we are requesting more time to gather it.

If you have any questions, please do not hesitate to give me a call at (618) 262-4136.

Sincerely,

DEE DRILLING CO.

(b) (6)

J. Roy Dee III
President

Enc.

Dee Drilling Company
P. O. Box 7
Mount Carmel, IL 62863-0007



Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



625 Liberty Ave
Suite 1700
Pittsburgh PA 15222
www.eqt.com

RECEIVED FEB - 6 2017

February 3, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

**RE: Oil and Gas Information Collection Request Part 1
Extension Request
EPA ICR Facility IDs: 1220550 and 1220600**

Dear Ms. Shine:

The Part 1 Operator Survey asks for detailed information pertaining to each individual well and well site location owned or operated by the companies listed below. The Information Collection Request (ICR) will require the gathering of information on thousands of facilities and wells. It will also be necessary to conduct quality assurances and quality control measures to verify data accuracy and compile the data into the form requested by the Agency. That endeavor alone will require substantial time and resources from EQT staff. Clean Air Act § 114 does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR.

Thus, EQT respectfully requests a 60-day extension to the ICR Part 1 for the following companies:

- EQT Production, LLC (ICR Facility ID: 1220550)
- EQT Production Texas, LLC (ICR Facility ID: 1220600)

The ICR's were received via certified mail on 12/9/2016 for the aforementioned facilities. EQT is requesting agency consideration to extend the deadline and allow **Part 1 responses be due on 4/8/2017**. Please feel free to contact me if you have any questions. I can be reached by phone at (b) (6) or via e-mail at (b) (6). Thank you for your time and consideration.

Sincerely,

(b) (6)

(b) (6)

Manager, Environmental

625 Liberty Ave.
Suite 1700
Pittsburgh, PA 15222

CERTIFIED MAIL



7016 2140 0001 1242 0506

Attn: Ms. Brenda Duke
US Environmental Protection Agency
109 TW. Alexander Drive, Mail Code E143-01
Research Triangle Park, NC 27709

NEOPOST

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**RETURN RECEIPT
REQUESTED**

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OAR-17-000-4768
P1

E Z LAND & CATTLE COMPANY, LTD.

P.O. Box 2323
Albany, Texas 76430

Direct 325-762-4018

Fax 325-762-3332

January 30, 2017

RECEIVED FEB - 6 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID 1198500
E Z LAND & CATTLE COMPANY, LTD.

Dear Mr. Tsirigotis:

On December 12, 2016, E Z LAND & CATTLE COMPANY, LTD., received several letters from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

As a result of market conditions we have reduced our staff (b) (4) and they are responsible for collecting information on over several wells/facilities spread out over a large area. Much of the information is not readily available and will require me to personally visit each site, because I don't believe I can delegate this to someone else. As I understand, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and therefore subjects me to criminal liability. It is unclear to me how to calculate when the response is currently due and request that you indicate in the response when your department considers the response due.

The result of a limited staff is to balance the reporting obligations to other regulatory agencies and the ICR while continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

We have attempted to contract this reporting information with a third party firm. However, due to the limited number of firms qualified to undertake this reporting and the massive request giving the industry by the EPA, no credible firm is available in the 60-day reporting window.

In addition to requesting additional time, the various aspects of the Part 1 Survey are not clear to me.

- Whose responsibility is it to respond when there is more than one owner?
- Whose responsibility is it to respond when the operator is different than the owner?
- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- I have tanks on site that we commonly refer to as "water knockouts." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

(b) (6)

A large black rectangular redaction box covering the signature area.

(b) (6)

A small black rectangular redaction box covering the name.

E Z LAND & CATTLE COMPANY, LTD.

cc: Ms. Brenda Shine

E Z LAND & CATTLE, LTD.
P.O. BOX 2323
ALBANY, TEXAS 76430



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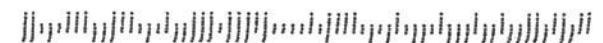
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RETURN RECEIPT
REQUESTED

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

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OAR-17-000-4769

P1

Holco Oil & Gas
P O Box 3358
Borger, TX 79008-3358
(806)274-6554

RECEIVED FEB - 6 2017

January 29, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED FEB - 6 2017

RE: REQUEST FOR EXTENSION OF TIME TO RESPOND TO THE OIL AND NATURAL GAS SECTOR ICR
FACILITY ID 1303650

I believe it was December 9th or 12th, 2016, our company, Holco Oil & Gas, received a letter from you, dated November 14, 2016, requesting very extensive information on the above Facility. (b) (6)
(b) (6) my husband signed for it but can't remember when. The Post Office didn't have a record but said that your office would've received the signed card. I attended a 3 hour meeting on January 10th to try to get some clarification and understanding of your information request and realize it is not something to be accurately accomplished in such a short time. Some information is not readily available and other information is not clear as to exactly what is being requested. It is our personal responsibility to collect this information; not something to delegate to someone else, because we are subject to criminal liability and required to certify the accuracy of the information provided to EPA. For reasons below, we respectfully ask for at least a 120 day extension to personally research and go to each site in order to furnish you the most accurate information possible.

My husband and I own (b) (4) low producing stripper wells, within a 60 mile radius. (b) (6)

(b) (6)

We are sincerely trying to meet your demands as best we can and as soon as possible while still operating and maintaining our leases in a safe and responsible manner. It seems the days are just not long enough. We appreciate your patience and truly hope you will grant us an extension.

Thank you,

(b) (6)

(b) (6)

Owner/Operator

Cc: Ms. Brenda Shine, U.S. Environmental Protection Agency
file

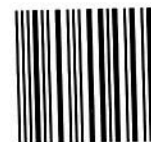
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RETURN RECEIPT
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Mr. Peter Isirigotis
U.S. E.P.A.

109 T.W. Alexander Dr.

Research Triangle Park, NC

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RETURN RECEIPT
REQUESTED

JAID ENERGY, LLC

RECEIVED F

PO Box 779
Graham, TX 76450
Phone: 940-549-0631

January 30, 2017

CERTIFIED MAIL # 7014 1820 0001 2001 2353

Attention: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code E143-01
Research Triangle Park, NC 27709

Re: ICR Request Letter
Primary Facility ID 1332400

Dear Ms. Shine,

The undersigned, in connection with the above mentioned primary Facility ID, requests a 90 day extension of the deadline for filing the ICR form related to the same. This entity is a family owned small business (b) (4). In order to fill out the form properly, as best we can, we will need some outside assistance. At this time we have not been able to acquire the assistance and find that the deadline is approaching without the ability to comply.

You are respectfully requested to grant an extension of time. We have been told that this request should be addressed to you as indicated in the request letter.

Yours very truly,

(b) (6)

(b) (6)

JAID ENERGY, LLC

Jaid Energy, LLC
PO Box 779
Graham, TX 76450

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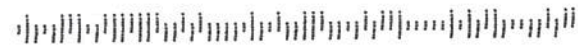
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30 JAN '17
PM 5 L



Attention: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code E143-01
Research Triangle Park, NC 27709

27709-031093



LAHOMA PRODUCTION, INC.

P.O. Box 487
Jenks, OK 74037-0487
(918) 633-5111

January 28, 2017

*Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, N.C. 27709*

*Re: Information Collection Request
Primary Facility ID 1373050
E-GGRT Code 9K7J-MZRW*

Dear Ms. Shine:

Pursuant to the certified letter we received on December 10, 2016, Lahoma Production, Inc. hereby requests an extension for the filing of the Section 114 reports requested in your recent letter. We are a very small company (b) (4) and this is the busiest time of the year for us as we are currently preparing tax information and tax returns for the tax year 2016 for several of our companies.

Thank you for your understanding in this matter.

Sincerely,

(b) (6)

*Larry E. Brown
President/Owner*

LEB:dh

CERTIFIED MAIL



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TURN SERVICE
REQUESTED



Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, N.C. 27709
14111111111111111111

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042-17-000-4776

PI



MEWBOURNE
OIL COMPANY

RECEIVED FEB 06 2017

Reagan L. Butts
Attorney

903.534.7986 (D)
rbutts@mewbourne.com

February 2, 2017

Via Email: shine.brenda@epa.gov; and
icr@epa.gov

Via Certified Mail; Return Receipt Requested

Attn: Ms. Brenda Shine
U.S. ENVIRONMENTAL PROTECTION AGENCY
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: **Request for Extension of Time for EPA Information Collection Request**

Mewbourne Holdings, Inc. and Mewbourne Oil Company
Primary Facility IDs: 1432750; 1432800; 1432850

Ms. Shine:

Mewbourne Holdings, Inc. and Mewbourne Oil Company (collectively "MOC") have received the Information Collection Request ("ICR" or the "Request") from Peter Tsirigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards. The MOC assigned primary facility IDs are **1432750; 1432800; and 1432850**. The Request directs MOC to send all questions regarding the ICR to your attention.

MOC respectfully requests an extension of not less than sixty (60) days from the date of this letter to respond to the ICR. This extension would place MOC's deadline to respond no earlier than **Monday, April 3, 2017**. This request for an extension of time is due to the volume of information requested in the ICR and the amount of time that it will take for MOC to comply with the Request. If longer extensions are being granted to other oil and gas operators, MOC asks that its extension be extended to allow as much time as possible to comply with the Request.

In addition, please note the following correct address for Mewbourne Holdings, Inc. and Mewbourne Oil Company:

Mewbourne Holdings, Inc.
c/o Mewbourne Oil Company
PO Box 7698
Tyler, TX 75711-7698

9988.001.00037065

P.O. Box 7698 • Tyler, Texas 75711
3620 Old Bullard Road • Tyler, Texas 75701

Ms. Brenda Shine
02/02/2017
Page -2-

The original ICR was improperly sent to the residential address of MOC's Vice President of Land and Geology. For all follow-up correspondence regarding the ICR, please utilize the following contact information:

**Mewbourne Holdings, Inc.
c/o Mewbourne Oil Company
PO Box 7698
Tyler, TX 75711-7698**

Attn: MOC Legal Department

Thank you for your consideration of this request for extension of time. If there are questions or concerns regarding this request, please contact me at (903) 561-2900 or via email at rbutts@mewbourne.com. I appreciate your professional courtesies and assistance in this matter.

Regards,

MEWBOURNE OIL COMPANY

(b) (6)

A large black rectangular redaction box covers the signature area, with the text "(b) (6)" in red at the top left corner.

Reagan L. Butts, Attorney

MEWBOURNE OIL COMPANY
P.O. BOX 7698
TYLER, TEXAS 75711

CERTIFIED MAIL



7011 1570 0001 8343 9334

Ms. Brenda Shine
U.S. ENVIRONMENTAL
PROTECTION AGENCY
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



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January 31, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID # 1435150, Company: Middleton Oil Company

Dear Mr. Tsirigotis:

On December 12, 2016, my company, Middleton Oil Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR")¹.

As a result of market conditions we have trimmed our staff (b) (4) and they are responsible for collecting information on (b) (4) spread out over approximately 25 square miles. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of (b) (6) Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me:

- *Whose responsibility is it to respond when there is more than one owner?*
- *Whose responsibility is it to respond when the operator is different than the owner?*

Mr. Peter Tsirigotis

January 31, 2017

Page 2

- *All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?*
- *I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they are tanks that do separate some gas/oil from water. How does EPA view this equipment?*
- *Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?*

Please contact me if you have any questions and I look forward to hearing from you.

David Mayes Middleton II

(b) (6)

Middleton Oil Company, President

cc: Ms. Brenda Shine

4306 Yoakum Blvd., Suite 540
Houston, Texas 77006
713.621.1915 (p) 512.791.9987 (c)
mmiddleton@middletonoil.com

JH MIDDLETON
OIL COMPANY

MAYES MIDDLETON

PLACE STICKER AT TOP OF ENVELOPE AT DOTTED LINE
OF THE RETURN ADDRESS

CERTIFIED MAIL

JH MIDDLETON
OIL COMPANY
4306 YOAKUM | SUITE 540 | HOUSTON, TEXAS 77006



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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

OAR 17-000-4779
P1

New Century Energy, Inc.

January 31, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T. W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED FEB - 6 2017

RE: Facility ID 1783600 Facility Survey

Dear Ms. Shine:

New Century Energy, Inc. is a company with (b) (4) employees, all having tasks assigned, which utilizes all the working hours available.

The Information Collection Request, in the letter we received on November 14, 2016, has not been completed. We are continuing to acquire the information requested.

We are asking for an extension of 60 days from the date of the letter, to allow for accurate submittal of the information.

We are requesting that the submittal of the survey be extended until March 31, 2017.

Any questions regarding this request can be directed to Michael D. Graham at 724-693-9266.

Sincerely,

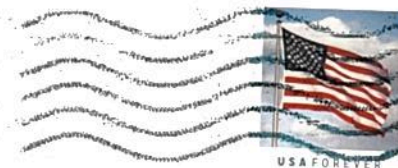
(b) (6)

Michael D. Graham
President

New Century Energy, Inc.
1851 North Road
McDonald, PA 15057

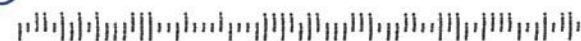
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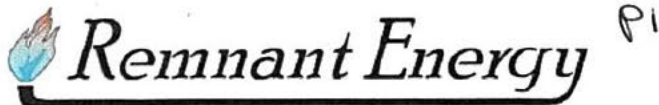
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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T. W. Alexander Drive
Mail Code E 143-01
Research Triangle NC 27709

27709-031099





January 20, 2017

RECEIVED FEB 26 2017

Office of Air Quality Planning & Standards
Attn: Peter Tsirigotis, Director
U. S. Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension for filing the Oil & Natural Gas ICR Survey
Clarification of Survey Terminology and Applications
Facility IC 1551250

In early January 2017, Remnant Energy, Inc. received the form letter to Oil & Natural Gas Operators from the U.S. EPA Office of Air Quality Planning & Standards dated November 14, 2016 with a requested due date of 30 days response requesting a national survey entitled ICR, which forms were not included in the request, and requiring extensive information and analysis of field data and equipment for the above referenced Facility. We are respectfully requesting an extension of 90 days to respond to the information collection request (ICR) for the reasons listed below.

A great deal of the data collection will require a personal visit to each location for verification, requiring me to personally give up time devoted to operating and managing this small business. In order to operate in the current economic decline in our industry, our company has remained very small and lean. (b) (4)

(b) (4)

Additionally, all annual state and federal reports, including but not limited to State Title III State(s) Tier 2 Reports, State(s) Severance Tax Reports are currently due, involving data collection and analysis for each wellsite. Much of the data the ICR Survey is requesting is available in the public domain agency databases at both the state and federal levels, but will need to be verified and augmented at each wellsite.


Monthly State(s) reports are also pending, including but not limited to production reports for each well, state agency royalty interest reports, end of year corporate surety bond approvals for wells of a certain age, semi annual allocations reports for each well, as well as routine testing reports for all wells to ensure environmental compliance at both state and federal levels.

It is challenging to run daily business operations with the level of agency reports required of us already. We are in the process of reviewing the ICR data collection and analysis being requested, in order to be in compliance, while at the same time attending to all other environmental, safety and health responsibilities currently required of us.

In reviewing this survey, some of the terminology demands additional clarification to be able to address what precisely is being requested, and whether it applies to our specific field situations and equipment. Therefore, we are requesting the 90 day extension in order to address the survey in professional and responsible manner. We appreciate your help in this matter.

Sincerely,

Richard Beyea
President

 **Remnant Energy**
REMNERANT ENERGY, INC.
P. O. BOX 509
PERRYTON, TX 79070

**RETURN RECEIPT
REQUESTED**



Office of Air Quality Planning
Attn: Peter Tsirigotis, Director
U. S. Env. Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709+0310



OAL-17000-4782
P1

January 27, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED FEB - 6 2017

RE: Request for Exemption and/or Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID's: 1770550 Rogers & Son

Dear Mr. Tsirigotis:

We are unsure of the exact date but believe that in mid-December of 2016, our company listed above received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facilities under the named entity above. For the following reasons, I respectfully request an exemption from completion, or at least an extension of no less than 60 days to respond to the information collection requests ("ICR"). I also ask that you provide the letter's certified receipt dates indicating when any ICR's may be due according to your records since we did not record when accepted.

Our Facilities have ownership in (b) (4)
(b) (4) Furthermore, Facility #1770550 only operates a
small business office and (b) (4)
(b) (4)

Obviously, our company's small office personnel do not have the "readily available information" for completion and should we need to acquire assistance from an outside company to compile and accurately report there would be costs associated. (b) (4)
(b) (4) any additional costs like this would be extremely burdensome. Otherwise, I would have to try to visit our multitude of conventional well locations at the most inaccessible time of the year to inventory each to be sure the information is collected and correct.

In addition to the complications associated with limited staff, Holidays, and end of the year reporting requirements (tax returns, DEP and Severance, royalty and 1099's, etc.), the timing of these ICR's could not be worse for a family owned business like ours. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient, safe and environmentally responsible manner.

Mr. Peter Tsirigotis

January __, 2017

Page 2

In addition to requesting an exemption and/or extension, I am unsure about sections of the Part 1 Survey and how they might apply for small producers like myself if I do have to complete it.

Please contact me if you have any questions and thank you for your cooperation.

Sincerely,

(b) (6)

(b) (6)

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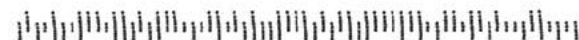
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MAILED FROM ZIP CODE 25234

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Div.
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T.W.Alexander Drive
Research Triangle Park, NC 27709

27709-031099





OAR-17-000-4786
P1

RECEIVED FEB - 6 2017

Via Certified Mail: 7011 0470 0001 5360 7736

January 31, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Dear Mr. Tsirigotis:

On December 12, 2016, we received several letters from you dated November 14, 2016, requesting extensive information on the referenced Facilities. We received an information collection request ("ICR") for SOGO III LLC (Facility ID 1613900), Stanolind Operating LLC (Facility ID 1625700), and Stanolind Oil and Gas (Facility ID 1625600). Please be advised that Stanolind Oil and Gas operates no oil or gas producing properties, and as a result, we think that no response is necessary for that entity. Please correct your records to reflect that. I also respectfully request an extension of 60 days to respond to the "ICR" for the reasons detailed below.

Due to various factors, we do not think we can do an adequate job in answering the ICR in the allotted time. Market conditions have necessitated (b) (4) and the remaining staff is responsible for (b) (4) activities/gas wells over a large area (approximately 150 miles X 250 miles). Much of the requested information is not available in our office and a visit to each facility will be required by me to collect the data in order to insure its accuracy. This problem is compounded by the fact that the ICR fell over the Holiday Season when (b) (6). In this regard, it is unclear to me exactly when the response is currently due (do holidays and weekends count?). I request clarification as to how to calculate the due date of the response.

The timing of the ICR also creates a problem in that it coincides with Sara Title III and other annual reporting requirements. With our limited personnel, more time is needed to comply with the ICR and to ensure that our operations continue to run in an efficient and environmentally responsible manner.

In addition to requesting additional time, the various aspects of the Part 1 Survey are confusing to me. Please explain the following:

- Section 3 of Part 1 is for centralized production surface sites. I assume this means multiple wells producing into a single battery. After completing section 3 for one battery are you to list the multiple wells in section 4? If so, do you need to repeat the answers to the same questions?
- The instructions state how to use the Unique Operator ID based on the Facility ID. How do you assign the Unique Surface Site ID for Sections 3 and 4?

Please contact me (phone: 432-640-0040, email: (b) (6)@stanolind.com) or (b) (6) in our office if you have any questions or need more information. Thank you for your consideration.

Sincerely,

(b) (6)

(b) (6)

Ex. VP Operations



Stanolind Oil and Gas LLC
SOGO III LLC
P. O. Box 210
Midland, Texas 79702

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL™



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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Div.
Office of Air Quality Planning & Standards
United States EPA
109 T. W. Alexander Dr.
Research Triangle Park, NC 27709

2770980310



0A17-000-4787

P1



RECEIVED FEB - 6 2017

January 12, 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143
Research Triangle Park, NC 27709

Re: Submission Extension Request for Part 1 Oil and Gas Operator Survey Response
November 14, 2016 Clean Air Act Section 114 Information Collection Request Letter
White Rock Oil and Gas LLC

Dear Ms. Shine,

White Rock Oil and Gas LLC received a Clean Air Act (CAA) Section 114 Information Collection Request (ICR) letter from Peter Tsirigotis, Director, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, dated November 14, 2016. The ICR requested the submittal of Part 1 operator frame census information for onshore petroleum and natural gas well surface sites and centralized production surface sites operated by White Rock Oil and Gas LLC. A copy of the November 14, 2016 request letter is included as an attachment to this correspondence for your reference.

Per Page 2 of the ICR request letter, the Part 1 operator survey information is required to be completed and submitted as described within 60 days of receipt of the request by the operator, or approximately January 16, 2017. White Rock Oil and Gas LLC is currently working diligently to compile and verify the required information. However, in late 2016, White Rock recently purchased (b) (4) oil and gas well sites and centralized production sites from (b) (4) representing a (b) (4) increase in the number of field assets operated by the company. The purchase of these new assets has required additional efforts be expended to collect and field-verify the site-specific information requested in Part 1 of the ICR for these facilities, including site equipment counts. These additional efforts have resulted in a delay in the completion of the ICR response.

For the reasons described above, White Rock Oil and Gas LLC hereby requests a 60-day extension be granted for submittal of the Part 1 operator survey information, to March 17, 2017. The additional time will ensure the accuracy and completeness of the information provided to the U.S.EPA. It should be noted that no extension of the deadline for submittal of the required Part 2 surveys is being requested at this time.

Your consideration and prompt response to this request is appreciated. If you have any questions regarding this request, please contact (b) (6) of TRICORD Consulting, LLC at (b) (6) or (b) (6) of TRICORD Consulting, LLC, at (b) (6)

Sincerely,

(b) (6)

(b) (6)

Vice President, Operations

White Rock Oil & Gas, LLC

Enclosures

cc: Mr. Peter Tsirigotis, Director, Sector Policies and Programs Division, Office of Air Quality
Planning and Standards

Mr. Keith Sheedy, Technical Advisor, Office of Air, Texas Commission on Environmental
Quality

Mr. Rob Lawrence, Policy Advisor, Energy Issues, EPA Region 6



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Suite 100 E
Dallas, Texas 75244

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Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143
Research Triangle Park, NC 27709

27709-031099



Utilities Department
Municipal Building
P.O. Box 579
92 N. Alexander Street
Toccoa, Georgia 30577
706.886.8451
706.886.7766 Fax



City of Toccoa

8942
CAR-17-000-8935
Part 2

December 13, 2016

Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: *Toccoa Natural Gas System, City of Toccoa, Georgia*
ICR ID 5008590 | Part 2 Detailed Facility Survey

Certified with Return Receipt Requested # 7015 0640 0002 5579 4887

Dear Ms. Shine:

Per your email exchange with (b) (6) on December 9, 2016, I am confirming that all of our facilities are downstream of the local distribution company custody transfer station. We receive natural gas via a city-gate station located immediately downstream of our take-point on the Williams-Transco Interstate Pipeline Company. We do not own or operate any of the facilities outlined in Part 2. According to our understanding, and your email reply, we are not required to complete a Part 2 Detailed Facility Survey.

If I have misunderstood the instructions or requirements, or your response to (b) (6) please do not hesitate to contact me.

Sincerely

(b) (6)
Utilities Director
City of Toccoa/Toccoa Natural Gas

cc: (b) (6) - Municipal Gas Authority of Georgia
file

OF THE RETURN

CERTIFIED MAIL



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City of Toxco

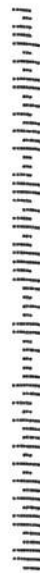
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Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



December 20, 2016

Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Drop: 6101A
Research Triangle Park, North Carolina 27711

**Re: Request to Extend ICR Reporting Due Dates
Southwestern Energy Part 1 Surveys
Southwestern Energy Part 2 Surveys**

Dear Mr. Tsirigotis:

Southwestern Energy is submitting this letter to request an extension to the reporting timeline for the "Information Collection Effort for Oil and Gas Facilities" ("ICR") Section 114 letters that we recently received. We understand the importance of the information requested in the ICR and support the agencies collection of the ICR data. However, we believe that additional time is warranted to assure that we can properly collect and verify the information prior to submittal to the EPA.

Southwestern Energy is one of the largest producers of natural gas in the lower 48 states. We own/operate over (b) (4) wells located in Arkansas, Colorado, Louisiana, Pennsylvania and West Virginia. Each of these wells is subject to the ICR Part 1 survey. We are subject to the ICR Part 2 survey for (b) (4) of our well sites. We also are subject to the ICR Part 2 survey for one of the gathering system pipelines that our production company operates (as determined by the Random Tool Generator).

Southwestern Energy also operates gas gathering and booster stations in Arkansas and Pennsylvania under our midstream operations. We are subject to the ICR Part 2 survey for (b) (4) of our gathering and booster stations.

We received the Section 114 letters by certified mail for both our Production and Midstream (Gathering and Boosting) operations on December 10, 2014. Based on the prescribed 60-day timeline for the Part 1 surveys, the submittal date would be February 8, 2017. Based on the prescribed 180-day timeline for the Part 2 surveys, the submittal date would be May 8, 2017.

Southwestern Energy is respectfully requesting a June 30, 2017 submittal date for both our ICR Part 1 surveys (Production) and Part 2 surveys (Production, Gathering and Booster Pipelines, Gathering and Booster Stations). Our request is based on multiple issues, with some of the key issues outlined below:

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- Southwestern Energy will need to complete the Part 1 survey for over (b) (4) wells. Although the Part 1 survey is limited in scope/detail, it still requires significant internal systems, communications and resources to compile the requested data. As an example, the Part 1 survey will require input from our Production Analyst, Engineering, Operations, and Environmental staff. Then the data will need to be aggregated and manually entered into the Part 1 survey sheet provided by the EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. We simply do not see 60-days (including holidays and vacation) as adequate time to complete this task.
- Southwestern Energy will need to complete the Part 2 survey for (b) (4) of our well sites, (b) (4) of our gathering and booster line “counties”, and (b) (4) of our gathering and booster facilities. Although not nearly as many “facilities” are subject to the Part 2 survey as the Part 1 survey, the data elements including items such as component counts, measurements, sampling, and detail design data are much more extensive. Similar to the Part 1 survey, the Part 2 survey will require significant internal systems, communications, and resources to compile the requested data. In addition, we will need to engage with external parties (e.g. engine lease companies, equipment manufacturers) to obtain requested data. As with the Part 1 survey, the Part 2 survey will need to be aggregated and manually entered into the Part 2 survey sheet provided by EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. The Part 2 survey will then need to be electronically uploaded via EPA eGGRT.
- In addition to the data acquisition, compilation, and report aggregation tasks, Southwestern Energy also needs time to review and validate that the information is correct for both the Part 1 and Part 2 surveys before submittal to the EPA. We recognize that this data needs to be as correct as possible for the agencies intended use.
- We acknowledge that the EPA communicated frequently throughout the ICR process. However, there were many changes that occurred to the Part 1 survey and Part 2 survey through their final issuance. These changes, although generally beneficial, still require us to review and confirm interpretations, and possibly establish protocols (e.g. sampling and measurement) before we can provide internal guidance as to the final data that is being requested and how it needs to be obtained.
- The ICR Part 1 and Part 2 surveys appear to be based on “calendar-days” and not “business-days”. This has significant impact to our resources (personnel) as the personnel that will be engaged are not assigned to work on weekends. Furthermore, the Section 114 letters were not issued until the busy Thanksgiving-Hanukah-Christmas season when our personnel enjoy holidays off and vacations (further limiting our “effective days” to complete the surveys). Even if the intent is to be based on “business-days”, we still see the need for extended timelines.
- The time commitment to complete the Part 1 and Part 2 surveys will have significant impact to our limited resources. In our current commodity priced environment, we have scaled back our

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personnel to support our base operations (e.g. production and gathering of natural gas). The resources needed to complete the Part 1 and Part 2 surveys will also need to complete their normally assigned duties during a very busy time of the year. We had commented on the significant resource burdens in our comment letter dated October 28, 2016 (attached).

- Finally, we believe that extending the deadlines (especially for Part 1 surveys) will allow us to check the Part 1 survey information against our 40 CFR Part 98 Subpart W information (report filing March 31, 2017).

In order to provide more accurate information, while allowing our staff to also work on their normally assigned duties, and based on the issues outlined above, we are respectfully request a June 30, 2017 submittal date for Southwestern Energy's Part 1 and Part 2 surveys.

If you have questions, please contact me at (b) (6) [@swn.com](mailto:(b) (6)@swn.com) or (b) (6)

Sincerely,

(b) (6)

Director, Corporate Environmental Programs

Attachment – SWN, Comments on Proposed Information Collection Request for Oil and Gas Facilities, October 28, 2016 submitted via e-filing at www.regulations.gov.



October 28, 2016

Via e-filing at www.regulations.gov

U.S. Environmental Protection Agency
EPA Docket Center
Mailcode-28221T
Attention: Docket ID No. EPA-HQ-OAR-2016-0204
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Comments on Proposed Information Collection Request for Oil and Gas Facilities

Dear Docket Clerk:

Southwestern Energy (SWN) appreciates this opportunity to submit comments on the notice of proposed Information Collection Request for Oil and Gas Facilities as posted in the Federal Register on June 3rd and the second draft on September 29th, 2016

SWN is currently the third largest producer of natural gas in the lower 48 United States. We are an independent energy company primarily engaged in natural gas and crude oil exploration, development, and production. We also operate midstream services focused on natural gas gathering and marketing. As an oil and gas sector company, the Information Collection Request and potential future regulations on existing sources will significantly affect our operations.

SWN understands and supports the need for better factual information regarding the oil and gas sector operations as a prelude to considering and or developing regulations for existing sources. We therefore understand and support the Information Collection Request which may provide EPA with better factual information. However, we believe that the Information Collection Request imposes an undue burden on the oil and gas sector in the manner and timing in which it is being implemented.

Part 1 ICR Survey Timelines and Resource Estimates

We recommend that EPA extends a more reasonable reporting timeline for the Part 1 surveys which will allow operators adequate time to compile and report better factual and more accurate data.

The proposed ICR requiring Part 1 surveys to be due within 30-days of request is an unreasonably short response time. In the ICR Supporting Statement, EPA estimates that the Part 1 survey will require approximately 7.76 hours per facility (aka well pad) to complete. Assuming that 7.76 hours is a fair assessment of time to complete each Part 1 survey, the resource impacts to SWN are approximately 19,400 hours for our Production Operations. Furthermore, assuming that SWN (and other companies) are given 30 "business" days to complete the Part 1 survey, and assuming a standard work hour day of 8

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hours, which is equivalent to 240 hours. This means in order to meet a 30 day timeline for Part 1 surveys, SWN would need to commit 80 of our personnel fulltime to this effort. This represents at least 10% of our “technical” work force. Furthermore, if the 30-day period is based on “calendar days” the required personnel increases as our technical employees are not expected to work over weekends. Calendar days would increase the required fulltime personnel to 110 employees; adding holidays would increase the employee count again. Furthermore, this segment of our workforce is vital to our operations and could not be dedicated full time to this task to the detriment of their regular responsibilities.

SWN has reviewed the Part 1 survey form and believes that we have the information necessary to complete the significant majority of the draft Part 1 survey. However, that information is not readily available in a singular data base or asset tracking system. Furthermore the Part 1 survey form is pre-populated with “drop down” selections. While we believe the intent of the “drop down” selections was/is to minimize resource impacts, it can actually have an adverse effect due to the manual line by line entry which will be required. With the various SWN personnel needed to locate, aggregate, compile and individually enter the data into the Part 1 survey for approximately 2,500 well pads, we believe the resource impacts could easily be doubled (e.g. 38,000+ hours, 160 full time technical staff, > 20% of our technical workforce).

Part 2 ICR Survey Timelines and Resource Estimates

We recommend that EPA extends a more reasonable reporting timeline for the Part 2 surveys which will allow operators adequate time to compile and report better factual and more accurate data.

The more detailed Part 2 surveys would be due within 120-days of request. EPA has estimated approximately 33 hours per facility to complete the Part 2 survey. Because the “population” or number of “facilities” that will be subject to Part 2 survey is “unknown” it is impractical to conduct a resource estimate similar to the Part 1 survey. However, unlike the Part 1 survey, the Part 2 survey requires a significant amount of information which a company may not have and for which considerable time and expense will be required to obtain. As an example, the Part 2 survey requires a detailed count of “components” (e.g. valves, flanges, connectors, PRVs, etc) as well as categorized by major equipment type (e.g. wellhead, separator, compressor, tanks, etc). In addition, Part 2 requires sampling of liquids at sources which may not be equipped for such sampling. Therefore facility “modifications” may be required to facilitate such sampling. These “modifications” may require engineering review, design and approval. Additional time would be required to make the necessary modifications and obtain the sample. These are a couple of examples of Part 2 survey elements which may significantly impact the resources needed to complete the survey.

As expressed above, SWN supports the acquisition of factual data to assist in the evaluation of impacts from proposed regulation for oil and gas existing sources. We find the ICR in its proposed form to be overly burdensome and the resource assessments and timelines (30-days/120-days) to be unreasonable. We recommend that the agency consider streamlining both the Part 1 and Part 2 surveys and utilize information that is already publically available (e.g. 40 CFR Part 98 Greenhouse Gas Inventory Rule

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Reporting). We also recommend that the agency extends the submittal deadlines to at least 180-days for Part 1 surveys and 180-days for Part 2 surveys.

We appreciate the opportunity to provide these comments and would be glad to meet with you to discuss our comments. If you have questions please contact me Doug Jordan at douglas_jordan@swm.com or 832-796-7628 or Roy Hartstein at roy_hartstein@swm.com or 832-796-4875.

Sincerely,

(b) (6)

Douglas Jordan
Director Corporate Environmental Programs
V+ Resource Development

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The Right People doing the Right Things,
wisely investing the cash flow from our
underlying Assets, will create Value+®

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P O Box 12359 • Spring, TX 77391-2359

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Southwestern Energy

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P O Box 12359 • Spring, TX 77391-2359

Peter Tsirigotis
U.S. EPA
Mail Code 6101A
Research Triangle Park
North Carolina 27711

December 21, 2016

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Mail Code: D205-01
Research Triangle Park, NC 27709

Subject: Section 114 of the Clean Air Act Information Collection Request
Primary Facility ID 1531000

Dear Mr. Tsirigotis:

On December 8, 2016, QEP Resources, Inc. ("QEP") received from your office an Information Collection Request ("ICR"), dated November 14, 2016. The ICR includes the requirement to complete the ICR Part 1 Operator Survey for all oil and gas production well surface sites and centralized production surface sites that QEP operates. The deadline for the Part 1 Operator Survey is 60 days from receipt of the letter.

QEP requests a 90-day extension such that the new deadline would be May 8, 2017. The reasons are twofold. First, QEP must report on over (b)(4) wells and facilities. This is a substantial undertaking that requires diversion of staff and resources from other critical tasks at the company.

Second, the key personnel who will answer Part 1 are the same personnel who have annual environmental reports due in the first quarter of 2017 and that are required under various laws, including:

- SARA Section 312 Tier II reports (March 1st)
- Greenhouse Gas Inventory Reports (March 31st)
- various state emission inventory reports

Thus, it is a substantial burden on QEP to meet these other deadlines while diverting resources to answer Part 1. The extra 90 days allows us to meet all deadlines with personnel focused on high quality environmental review, assessment and reporting.

The law supports providing a 90-day extension of the deadline for responding to Part 1. Clean Air Act does not impose any limitations or constraints on the period that EPA may allow for responding to an ICR. To the contrary, the particular element of section 114 on which EPA must be relying as authority in this case – 114(a)(1)(G), which authorizes EPA to request "such other information as the Administrator *may reasonably require*" – requires EPA to set reasonable deadlines.

Mr. Peter Tsirigotis

Page 2

Here, Part 1 asks for detailed information about each well and well site owned or operated by QEP. QEP's inventory of over (b) (4) wells and facilities will require substantial time and resources to answer every element of Part 1. QEP must also QA/QC the data to verify its accuracy and compile the data into the form requested by the Agency. The 60-day deadline imposed by the ICR is an unreasonable amount of time in which to complete this work.

QEP appreciates your consideration of this request for a 90-day extension of the deadline for the ICR Part 1 Operator Survey. As noted in your letter, it is vital for the agency to use the very best information available to develop meaningful standards. An extension of the deadline will assist QEP to provide information that is complete and accurate. If you have any questions concerning this request, please feel free to contact (b) (6) Supervisor Environmental Engineering, at (b) (6) or at (b) (6) @qepres.com .

Sincerely,

QEP ENERGY COMPANY

(b) (6)

Vice President, Production & HSE

D205-ALT Johnson



SS

Page 1 of 1

ORIGIN: DENVER (303) 672-6900
(b) (6)
CLP RESOURCES INC
1050 17TH ST
STE 800
DENVER, CO 80265
UNITED STATES US

SHIP DATE: 21DEC16
ACTWGT: 0.20 LB
CAD: 102775932/NET3790

BILL SENDER

TO DIRECTOR, SECTOR POLICIES AND PRGMS
U.S. EPA
107 T.W. ALEXANDER DRIVE

RESEARCH TRIANGLE PA NC 27709

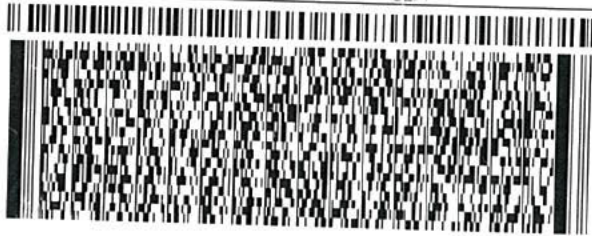
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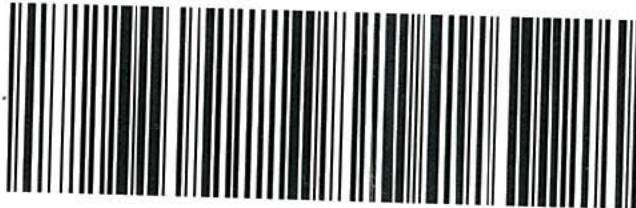
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MURRAY ENERGY CORPORATION

46226 National Road
St. Clairsville, Ohio 43950

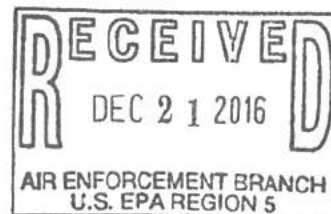
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PHONE: (740) 338-3100
FAX: (740) 338-3405
www.murrayenergycorp.com

December 14, 2016

Via United States Mail

United States Environmental Protection Agency
Attention: Brenda Shine
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



***Re: November 14, 2016 Correspondence - Information Collection Request
("Letter")***

Dear Ms. Shine:

I am in receipt of your letter dated November 14, 2016 requesting information from "oil and gas" facilities pursuant to Section 111 of the Clean Air Act (this Letter has been enclosed for your convenience). Please let this correspondence serve as confirmation that your Letter was inadvertently sent to a Murray Energy Corporation subsidiary address and, based upon the phone call discussed below, Murray Energy Corporation and its affiliates and subsidiaries are relieved from responding to your Letter.

As was discussed between (b) (6) and a member of your office in a phone conversation of December 12, 2016, Murray Energy Corporation does not have a subsidiary company with the name of American Energy, LLC to which your Letter was addressed. Moreover, we do not operate any oil and gas facilities.

Please let me know if you have any questions or concerns.

Respectfully,

(b) (6)

Assistant General Counsel

RECEIVED

JAN 10 2017

Enclosures

WATER ENFORCEMENT & COMPLIANCE
ASSURANCE BRANCH, EPA, REGION 5

cc: Mike Hopkins, Chief of Permitting,
Division of Air Pollution Control,
Ohio EPA
50 W Town St #700
Columbus, OH 43215

Ed Nam, Acting Direct,
Air Radiation Division, EPA Region 5
77 West Jackson Boulevard
Mail Code: A-18J
Chicago, IL 60604-3507

Peter Tsirigotis
Direct, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States EPA
Mail Code 6103A
1200 Pennsylvania Ave., NW
Washington, DC 20460



United States
Environmental Protection
Agency
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Brenda Shine
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Research Triangle Park, NC 27709